

Message

From: Krueger, Thomas [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5032E094667E4AB3BCD05326C7C3CF18-TKRUEGER]
Sent: 10/23/2017 4:34:11 PM
To: Higginbotham, Paul [PHIGGINB@idem.IN.gov]
Subject: RE: Information request on work at Outfall 001

Paul,

Have you heard anything further from AM on the draft order?

Tom Krueger

From: Higginbotham, Paul [mailto:PHIGGINB@idem.IN.gov]
Sent: Thursday, October 05, 2017 3:11 PM
To: Krueger, Thomas <krueger.thomas@epa.gov>; Mendez, Thomas <mendez.thomas@epa.gov>; Arnold, Paul S LT <Paul.S.Arnold2@uscg.mil>
Cc: McClure, Linda (IDEM) <lmccclure@idem.IN.gov>; Alberts, Sierra <SAlberts@idem.IN.gov>; Groce, Samantha <SGroce@idem.IN.gov>; bwolff@idem.in.gov
Subject: FW: Information request on work at Outfall 001

Tom, Tom and Lt. Arnold:

The below is the AM response to EPA comments on their original schedule for 001.

Thanks.

From: Barnett, Thomas R [mailto:Thomas.Barnett@arcelormittal.com]
Sent: Thursday, September 28, 2017 6:58 AM
To: Higginbotham, Paul <PHIGGINB@idem.IN.gov>
Cc: Doyle, Kevin <Kevin.Doyle@arcelormittal.com>
Subject: Information request on work at Outfall 001

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Paul, per your request in regards to the EPA questions. I am on vacation this week, back next week, but please call my cell if we need to talk sooner.

Tom –

The below are some of the issues that EPA had with your initial Schedule Submittal. Sorry that I did not get them to you earlier.

- 1) Why wouldn't it be feasible to install a baffle at 001? Why would it take more than 3 months to do?

There is currently a steel baffle at the 001 Outfall structure. The "weir" at Outfall 001 was originally installed to function as a baffle and has been very effective in ensuring that once oil enters the containment area, it does not discharge into the canal. However, as noted in our draft proposed schedule, we are currently evaluating the feasibility of installing an additional baffle upstream of the outfall structure, but downstream of the CWTP discharge and the USS NCCW/stormwater discharge. As a part of our feasibility analysis, we uncovered this 102"

sewer, and have Lindahl Marine (divers) out this week assessing whether or not they can install a baffle in the sewer by accessing a manhole located at this point, or if there are alternative methods. The physical configuration of the 102" pipe to Outfall 001 is an oval that undergoes two inverted siphons before final discharge. Additionally, the variability of flow within the sewer needs to be evaluated, as a baffle is only effective for oil removal if a specific flowrate and level is maintained. AM should be able to evaluate the study report and make a decision on how to proceed by the end of next week.

It could possibly take more than 3 months to install this baffle due to a number of reasons, including but not limited to: feasibility study, design bidding/engineering, bidding of installation, and the actual installation. As mentioned above, the installation of a baffle within the sewer may require significant modifications to the current sewer configuration that cannot be expedited.

- 2) Have their CWTP optimization efforts worked? Are they seeing any oil exiting the CWTP now?

The CWTP optimizations have significantly improved the treatment plant operations. However, as stated previously, and as provided in the conclusions of our earlier fingerprinting work, the CWTP was not the source of the 001 sheen. To date, no visible oil from the CWTP has been present in the 001 containment structure.

- 3) Why not do the fingerprinting work now?

Our proposed work plan submitted to IDEM and EPA proposes that we will conduct additional fingerprinting of any remaining sheens after corrective actions are complete. The objective of additional analyses will be to determine the source of possible residual sheens to guide further corrective actions, if necessary.

- 4) Do they have any level of confidence that Phase 1 and Phase 2 will stop the oil discharges? If not, it will be until January 2018 before we get any other proposals for measures to abate the releases. That seems unacceptably long – shouldn't they be evaluating contingencies now, along with all the other measures. They are in violation of OPA and likely of the permit; their obligation is to cease the releases/discharges ASAP.

On June 13, 2017, ArcelorMittal called in a report of an oil sheen emanating from the Outfall 001 containment structure into the Indiana Harbor Ship Canal. This sheen was captured by soft booms we keep in place outside of the steel weir containment structure as a conservative measure. This has been the only known discharge of oil sheen from the weir into the canal. Since January, we have had a contractor in place to maintain our oil release prevention measures at the containment structure. This collection and removal has been done through the use of soft booms, and absorbent pads in the containment structure, and has effectively controlled any buildup of oil sheen. Repairs and corrective actions have been implemented and the oil to the containment structure has greatly reduced. We believe we are compliance with the OPA and NPDES requirements.

- 5) Is US Steel still seeing oil in its downstream sewers?

We have forwarded your inquiry to US Steel for response.

- 6) Can the Oct. 30 date for remaining US Steel heat exchangers be expedited? Have they found out the status of parts availability?

We have forwarded your inquiry to US Steel for response.

ArcelorMittal Indiana Harbor LLC.
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